

AO91 (Rev. 12/03) Criminal Complaint

Felony

AUSA

United States District Court
Southern District of Texas
FILED

UNITED STATES DISTRICT COURT

MAY - 6 2019

Southern District Of Texas Brownsville Division

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

vs.

Berenice GUERRERO-Luna
A203 645 784 MexicoCase Number: B-19- *MJ-543*

I, the undersigned complainant state that the following is true and correct to the best of my

knowledge and belief. On or about May 04, 2019 in Cameron County, inthe Southern District Of Texas defendant(s)

knowingly, willfully, and in reckless disregard of the fact that (3) undocumented alien(s) had entered the United States in violation of law and remained in the United States in violation of law, did transport and move said alien(s) by means of a motor vehicle with intent to further their unlawful presence,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii)I further state that I am a(n) Border Patrol Agent and that this complaint is based on the following facts:

On May 4, 2019 at approximately 9:15 p.m., Border Patrol Agents received information from a concerned citizen of possible subjects on her property near the river in Brownsville, Texas.

As agents were arriving at the location, they observed a vehicle that was pulled over on the side of the road with its break lights activated. As agents got closer, the vehicle departed at a high rate of speed. Agents were able to catch up to the vehicle shortly after it departed from the area. Vehicle checks were conducted on the red in color GMC Sierra and it came back registered from Cypress, Texas. Border Patrol Agents then proceeded to initiate a traffic stop near the intersection of Dakota Avenue and Southmost Road.

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Signature of Complainant

Quintanilla, Adalberto Border Patrol Agent

Printed Name of Complainant

Sworn to before me and signed in my presence,

May 06, 2019

Date

at

Brownsville, Texas

City/State

Ronald G. Morgan

Name of Judge

U.S. Magistrate Judge

Title of Judge

Signature of Judge

AFFIDAVIT

In support of Criminal Complaint

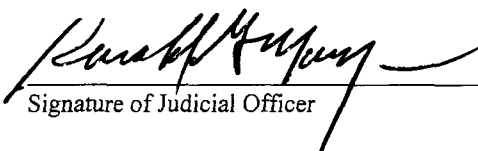
UNITED STATES OF AMERICA**CRIMINAL COMPLAINT**


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Agents approached the passenger side of the vehicle and identified themselves as Border Patrol Agents. A male subject was sitting in the front passenger side of the vehicle accompanied by a female driver. Agents questioned the passenger as to his citizenship in the English language. A male passenger later identified as CHAY-Godinez, Elias Alexander, did not answer the question and avoided eye contact. Agents again asked the subject as to his country of citizenship this time in the Spanish language to which he responded that he was from the Country of Mexico with no documents to be in the United States legally. Agents proceeded to question the driver, later identified as Berenice GUERRERO-Luna as to her country of citizenship to which she also responded to be from Mexico with no documents. As agents continued their investigation they observed another two subjects sitting at the rear seats of the vehicle. Both subjects were questioned as to their country of citizenship and both were also in the United States illegally.

All 4 subjects were detained and transported to the Fort Brown Border Patrol Station for further case development. After further case development it was determined, through sworn statements and photo lineups by two material witnesses, that Berenice GUERRERO-Luna was the female driver who was transporting (3) undocumented aliens for monetary gain.

SUBSCRIBED and SWORN to before me this 6th day of May, 2019.

Signature of Judicial Officer

Border Patrol Agent
Signature of Complainant